

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRAIG CARTON,

Defendant.

Case No. 17 Cr. 680 (CM)

ORAL ARGUMENT
REQUESTED

NOTICE OF MOTIONS

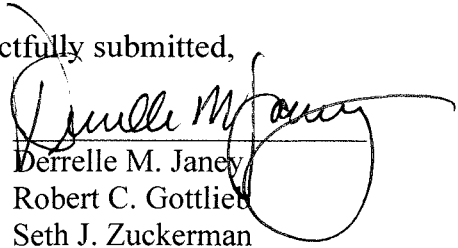
PLEASE TAKE NOTICE, that defendant CRAIG CARTON, by and through his undersigned attorneys, GOTTLIEB & JANEY LLP, upon the annexed affirmation of Derrelle M. Janey, attorney for the defendant, duly sworn to on the 1st day of October, 2018; all exhibits attached thereto; the accompanying Memorandum of Law; and the prior proceedings herein, hereby submits this Notice of Motions *in Limine*: (1) to preclude the Government from any reference, during the Government's case-in-chief, to pending civil lawsuits filed against Mr. Carton; (2) to preclude the Government from any reference to or introducing any evidence or discovery pertaining to or obtained by and through the Securities and Exchange Commission civil proceeding commenced against Craig Carton, Joseph Meli, Advance Entertainment, LLC, AdvanceM Ltd., Misoluki, Inc., Misoluki, LLC, Ticket Jones, LLC, and Tier One Tickets, LLC; (3) to preclude the Government from introducing evidence of Mr. Carton's purported failure to file tax returns in 2016 under Fed. R. Evid. 404(b); (4) to preclude the Government from making any pejorative, inflammatory and prejudicial remarks about Mr. Carton; (5) to preclude the Government from introducing alleged co-conspirators statements; and (6) to preclude the Government from any reference to or the introduction of any

evidence pertaining to the guilty plea, plea allocution, conviction, sentence, or voluntary sentencing statement of Joseph Meli or Michael Wright.

Dated: New York, New York
October 1, 2018

Respectfully submitted,

By:



Derrelle M. Janey
Robert C. Gottlieb
Seth J. Zuckerman

GOTTLIEB & JANEY LLP
111 Broadway, Suite 701
New York, NY 10006
Tel.: (212) 566-7766
Fax: (212) 374-1506

*Attorneys for Defendant
Craig Carton*